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 June 10, 2003

Mr. Michael S. Collins
 HSW EIS Document Manager
 Richland Operations Office
 U.S. Dept. of Energy, A 6-38
 P.O. Box 550
 Richland, WA, 99352-0550

Dear Mr. Collins:

re: HSW EIS - Hanford Waste Program.

I am concerned about Hanford, SWaste and believe in the following principles to solve the problem:

1. The safety of all life down river from Hanford must be foremost. Those of us who did not produce this waste should not be endangered by its leaking into the Columbia River.
2. The waste should be given back to its producers for disposal, and the producers prohibited from making any more.
3. All nuclear waste production should be shut down, so that the earth's life will no longer be endangered by nuclear waste production.
4. The welfare of mankind, flora & fauna, the purity of water and air, the freedom from exposure to nuclear waste forms should be our nation's principle. Public law and government actions should invariably enforce this principle.

Sincerely yours

Alberta G. E. Rould
 (ALBERTA G E ROULD)

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June 10, 2003

Mr. Michael S. Collins
HSW EIS Document Manager
Richland Operations Office
U.S. Department of Energy, A6-38
P.O. Box 550
Richland, WA 99352-0550

Dear Mr. Collins:

Subject: Comments on HSW EIS Document

I have reviewed all of the Summary of the *Revised Draft Hanford Site Solid (Radioactive and Hazardous) Waste Program Environmental Impact Statement, Richland, Washington*, DOE/EIS-0286D2, March 2003, and have the following comments:

- 1 I generally agree with the section "DOE Preferred Alternative" on page S.41. The methods for storage, treatment, and disposal appear to be reasonable and provide protection for the public, workers, and environment. However, I am anxious to hear that more frequent shipments of TRU waste are being made to the WIPP site, and that a long overdue treatment process for MLLW is operating and reducing the backlog of MLLW from the Hanford site. The problems with and orders from the State of Washington must be addressed and settled promptly. DOE must take appropriate actions in accordance with the Tri-Party Agreement to reach written agreements with the State to promptly permit shipment of TRU waste and MLLW in and out of Hanford.
 - 2 Regarding the "Areas of Controversy" on page S.42, I have two thoughts. First, receipt of offsite waste should be permitted, just as Hanford sends part of its excess and waste materials to other sites. In order to clean up the entire DOE complex, it is reasonable to accumulate certain types of materials in select places to reduce the overall cost of security and long-term stewardship to our nation. Second, I feel that enough is known about transportation impacts to proceed without reanalysis as part of this HSW EIS. We need to get on with the work of cleaning up the Hanford site rather than refusing to finalize agreements, resulting in the filing of lawsuits.
- Concepts that are Missing from this HSW EIS or Other EIS Documents
- 3 1. Some of the radioactive material that was discarded prior to 1970 is what we would now designate as TRU waste. There is a limited number (many fewer than the total) of waste sites at Hanford that should be characterized to determine which sites in addition to 618-10, 618-11 and the caissons in 200-W contain TRU waste in non-RCRA-compliant burials. Then the portions of each site containing TRU waste should be retrieved, packaged, and shipped to WIPP for permanent disposal.
 - 4 2. The HLW melters removed from the Waste Treatment Plant will not necessarily meet requirements for disposal in a RCRA-compliant facility at Hanford. This is particularly true if the outlet of the melter plugs and HLW solidifies inside the melter. I understand that this general subject is to be addressed in the Tank Waste EIS.

Sincerely,

Les Davenport

Les Davenport
Retired Nuclear Criticality Safety Engineer

Jim Curdy
P.O. Box 876
Mattawa, Wa. 99349

June 2003

Comments on EIS Covering Hanford
By Mike Collins

In reviewing this EIS report consisting of three volumes. There are many things in error that have been cited by others.

We have many comments that cover those things that are not correct. The EIS report will continue for many years, with each year problems will be brought to the attention of the reviewers. As each scientist develops new ideas and solutions to the use of the waste over the years (maybe 100's years) the residue changes, in time others will take care of this.

1

The EIS study is a very good starting point and with each effort for a solution over the years they will have to amend the document. Attempting to project solutions into the future are only guess and a good guess is what we end up with.

2

The report has not made use of the "Columbia River Basin Treaty" that covers the water in the River. Testing the water using the records before the Project was started and the changes that have resulted since. We do not seem to have used these records. Enclosed is a copy of the Treaty, for inclusion in the EIS.

3

A revised environmental impact statement (EIS) for managing radioactive and solid waste is better than the original, But it's good enough for the next several years. The editors are to be complemented for their work. Time and new knowledge will be the amending factors. Future generations will be making the decisions.



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
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IN REPLY REFER TO:

ER03/0373

June 26, 2003

Mr. Michael S. Collins
HSW EIS Document Manager
Richland Operations Office
U.S. Department of Energy, A6-38
P.O. Box 550
Richland, Washington 99352

Dear Mr. Collins:

The Department of the Interior has reviewed the revised Draft Environmental Impact Statement (DEIS) for the Hanford Site Solid Radioactive and Hazardous Waste Program, Richland County, Washington. The Department offers the following comments for use in the Final Environmental Impact Statement (FEIS):

- 1 The revised DEIS includes additional alternatives as compared to your earlier DEIS; however, we recommend expanding the analysis of environmental effects to take into account non-radiological contaminants, include site-specific toxicological information, and more thoroughly address potential effects to biota.
- 2 The Ecological Resources and Environmental Consequences sections should be revised to evaluate all anticipated contaminants associated with the various wastes. For instance, impacts to Columbia River aquatic and riparian resources were limited to key radionuclides (page I.27). All radiological and non-radiological hazardous waste should be identified and evaluated for exposure, effects, and risk. The risk analysis should include an evaluation of cumulative, additive, synergistic, and antagonistic effects of all potential contaminants in order to ascertain appropriate clean-up levels. We also strongly suggest that site-specific toxicological data for local species be included in any risk assessments so effect levels can be customized to local conditions. We realize that many uncertainties exist for the Hanford site, but identifying which contaminants have the potential to be released and determining effect levels to biota are necessary to conduct a quality ecological risk assessment. We recommend that additional data be collected and that you coordinate with the Hanford Natural Resource Trustee Council on the evaluation of risk to ecological receptors.
- 3 In the Waste Streams and Waste Management Facilities section, the DEIS states that waste will be disposed of in lined and unlined facilities based on whether the waste is considered to be low-level, mixed low level, or transuranic. The Department recommends that any in-ground disposal of waste be in lined facilities that are designed to last as long as the waste is hazardous and/or radioactive. Operation and maintenance

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and monitoring plans should be clearly described in the FEIS to ensure that waste disposal sites do not result in unforeseen impacts to natural resources and to provide better data for analysis. We recommend that compliance sampling and monitoring be done at the anticipated release sites for groundwater and surface water, as opposed to the downstream location described in the DEIS. We also suggest that cleanup and monitoring be conducted based on effect concentrations of the various contaminants rather than the general definitions of low-level, mixed low level, and transuranic wastes provided in the DEIS.

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Habitat restoration is not directly discussed in the list of potential mitigation measures. The FEIS should identify habitat restoration as a mitigation method when existing habitats are impacted by construction activities associated with the solid waste program or where contaminants adversely affect habitat quality.

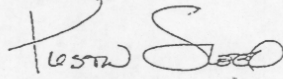
5

Section 7 of the Endangered Species Act (Act) of 1973, as amended, requires Federal Agencies to consult with the U.S. Fish and Wildlife Service (Service) if their actions may affect a federally listed threatened or endangered species. Section 9 of the Act prohibits the "take" (e.g., harm, harassment, pursue, injure, kill) of federally listed wildlife species. Take can only be permitted pursuant to the pertinent language and provisions in Section 7 and Section 10(a) or through a special rule under Section 4(d) of the Act. Informal consultation may be used to exchange information and resolve conflicts with respect to listed species prior to a written request for formal consultation.

For this project, the species list that you include is accurate; however, the Federal action agency under section 7(a)(2) of the Act is required to determine if the project will have no affect or may affect listed species. The DEIS contains a general description of endangered species in section 4.6.4 of the Affected Environment discussion, but there is no effect analysis provided. We suggest that you complete an effect analysis to be in compliance with the Act. If you have any questions regarding your responsibilities under section 7, please contact the Service at the number provided below and we will be glad to provide technical assistance.

We appreciate the opportunity to review and comment on the DEIS. We look forward to continuing to work with the Department of Energy on cleanup, habitat restoration, and management issues at the Hanford Site. If you have any questions regarding our comments or would like to discuss in greater detail, please contact Don Steffek, Regional Chief, Environmental Contaminants Program, Fish and Wildlife Service, at (503) 231-6223.

Sincerely,



Preston Sleeper
Regional Environmental Officer

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